

*Felony*

**UNITED STATES DISTRICT COURT**

for the  
Southern District of Texas

~~United States District Court~~  
~~Southern District of Texas~~  
**FILED**

MAY 31 2019

United States of America )

V. )

Julian MARTINEZ )

*Defendant(s)* )

Case No. *B-19-MJ-624*

David J. Bradley, Clerk of Court

**CRIMINAL COMPLAINT**

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of 05/30/2019 in the county of Cameron in the Southern District of Texas, the defendant(s) violated:

*Code Section*  
Title 18, United States Code, Section 1470

*Offense Description*  
knowingly transferred obscene materials a minor under the age of 16.

This criminal complaint is based on these facts:

On May 30, 2019, agents with the Homeland Security Investigations (HSI) led Rio Grande Valley Child Exploitation Investigations Task Force (RGV CEITF) conducted an online investigation into the online solicitation of minors. The investigation led agents to Julian MARTINEZ.

During a post-Miranda interview, MARTINEZ admitted to using a Samsung Galaxy S9+ smart phone, which is a facility and means of interstate and foreign commerce, to transfer three (3) images of an erect male penis to an individual who he knew had not attained the age of 16.



Continued on the attached sheet.

*Scott McIver*

*Complainant's Signature*

Scott McIver Special Agent

*Printed name and title*

Sworn to before me and signed in my presence.

*May 31, 2019*  
*Date*

Brownsville, Texas

*City and State*

*Ronald G. Morgan*

*Judge's signature*

Ronald G. Morgan U.S. Magistrate Judge

*Printed name and title*